

Presented to the Court by the foreman of the  
Grand Jury in open Court, in the presence of  
the Grand Jury and FILED in the U.S.  
DISTRICT COURT at Seattle, Washington.

By William M. McCool 20 14  
Deputy Clerk

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff

v.

1. ERIC MARQUEZ,  
2. HECTOR HUGO GARCIA GUTIERREZ,  
3. BALTAZAR REYES GARCIA,  
4. HECTOR CONTRERAS IBARRA,  
5. PABLO CATANO,  
6. OSCAR LUNA MERCADO,  
7. MIGUEL VALDOVINOS CISNEROS, a.k.a.  
"Miguelito,"  
8. IVAN BETANZOS TORRES,  
9. ANGEL SERRANO CARRENO,  
10. LEOPOLDO SAVALZA VELA, a.k.a "Polo,"  
11. LUIS QUINONES CEJA, a.k.a "Cookie,"  
12. DANIEL RAMOS DOMINGUEZ,  
13. EDGAR GONZALEZ,  
14. LILLIANA VELIZ,

Defendants.

NO. **CR14-287JR**

INDICTMENT

The Grand Jury charges that:

1 **COUNT 1**

2 **(Conspiracy to Distribute Controlled Substances)**

3 Beginning at a time unknown, but within the past five years, and continuing until  
4 on or about October 26, 2016, in King, Skagit, Snohomish, and Whatcom Counties,  
5 within the Western District of Washington, and elsewhere, ERIC MARQUEZ, HECTOR  
6 HUGO GARCIA GUTIERREZ, BALTAZAR REYES GARCIA, HECTOR  
7 CONTRERAS IBARRA, PABLO CATANO, OSCAR LUNA MERCADO, MIGUEL  
8 VALDOVINOS CISNEROS, IVAN BETANZOS TORRES, ANGEL SERRANO  
9 CARRENO, LEOPOLDO SAVALZA VELA, LUIS QUINONES CEJA, DANIEL  
10 RAMOS DOMINGUEZ, EDGAR GONZALEZ, and LILLIANA VELIZ, and others  
11 known and unknown, did knowingly and intentionally conspire to distribute substances  
12 controlled under Title 21, United States Code, Section 812, Schedules I and II, including  
13 methamphetamine, heroin, and cocaine, contrary to the provisions of Title 21, United  
14 States Code, Sections 841(a)(1) and 846.

15 **Specific Quantity Allegations as to Methamphetamine**

16 1. With respect to Defendants ERIC MARQUEZ, HECTOR HUGO GARCIA  
17 GUTIERREZ, BALTAZAR REYES GARCIA, HECTOR CONTRERAS IBARRA,  
18 PABLO CATANO, OSCAR LUNA MERCADO, MIGUEL VALDOVINOS  
19 CISNEROS, IVAN BETANZOS TORRES, ANGEL SERRANO CARRENO,  
20 LEOPOLDO SAVALZA VELA, and LUIS QUINONES CEJA, their conduct as  
21 members of the conspiracy charged in Count 1, which includes the reasonably  
22 foreseeable conduct of other members of the conspiracy charged in Count 1, involved 50  
23 grams or more of actual methamphetamine, and 500 grams or more of a mixture or  
24 substance containing a detectable amount of methamphetamine, in violation of Title 21,  
25 United States Code, Section 841(b)(1)(A).

26 **Specific Quantity Allegations as to Heroin**

27 2. With respect to Defendants, ERIC MARQUEZ, HECTOR HUGO  
28 GARCIA GUTIERREZ, BALTAZAR REYES GARCIA, HECTOR CONTRERAS

1 IBARRA, PABLO CATANO, OSCAR LUNA MERCADO, MIGUEL VALDOVINOS  
2 CISNEROS, IVAN BETANZOS TORRES, ANGEL SERRANO CARRENO, and LUIS  
3 QUINONES CEJA, their conduct as members of the conspiracy charged in Count 1,  
4 which includes the reasonably foreseeable conduct of other members of the conspiracy  
5 charged in Count 1, involved one kilogram or more of a substance containing a detectable  
6 amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(A).

7  
8 **Specific Quantity Allegations as to Cocaine**

9 3. With respect to Defendants ERIC MARQUEZ, HECTOR HUGO GARCIA  
10 GUTIERREZ, BALTAZAR REYES GARCIA, HECTOR CONTRERAS IBARRA,  
11 PABLO CATANO, OSCAR LUNA MERCADO, MIGUEL VALDOVINOS  
12 CISNEROS, IVAN BETANZOS TORRES, ANGEL SERRANO CARRENO, and LUIS  
13 QUINONES CEJA, their conduct as members of the conspiracy charged in Count 1,  
14 which includes the reasonably foreseeable conduct of other members of the conspiracy  
15 charged in Count 1, involved 500 grams or more of a mixture or substance containing a  
16 detectable amount of cocaine, in violation of Title 21, United States Code, Section  
17 841(b)(1)(B).

18 All in violation of Title 21, United States Code, Section 846.

19 **ASSET FORFEITURE ALLEGATION**

20 Upon conviction of the offenses alleged in Count 1 of the Indictment, the  
21 defendants, ERIC MARQUEZ, HECTOR HUGO GARCIA GUTIERREZ, BALTAZAR  
22 REYES GARCIA, HECTOR CONTRERAS IBARRA, PABLO CATANO, OSCAR  
23 LUNA MERCADO, MIGUEL VALDOVINOS CISNEROS, IVAN BETANZOS  
24 TORRES, LEOPOLDO SAVALZA VELA, ANGEL SERRANO CARRENO, LUIS  
25 QUINONES CEJA, DANIEL RAMOS DOMINGUEZ, EDGAR GONZALEZ, and  
26 LILLIANA VELIZ, shall forfeit to the United States, pursuant to Title 21, United States  
27 Code, Section 853, any property constituting, or derived from, any proceeds obtained,  
28 directly or indirectly, as the result of such offenses, and also shall forfeit any property  
used, or intended to be used, in any manner or part, to commit, or to facilitate the

1 commission of, such offenses, including, but not limited to, a sum of money representing  
2 the proceeds obtained as a result of the offense charged in Count 1, above.

3 If any of the above described forfeitable property, as a result of any act or  
4 omission of the Defendants,

- 5 1. cannot be located upon the exercise of due diligence;
- 6 2. has been transferred or sold to, or deposited with, a third party;
- 7 3. has been placed beyond the jurisdiction of the Court;
- 8 4. has been substantially diminished in value; or
- 9 5. has been commingled with other property which cannot be divided //

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1 without difficulty; it is the intent of the United States, pursuant to Title 21, United States  
2 Code, Section 853(p), to seek the forfeiture of any other property of the Defendants up to  
3 the value of the above described forfeitable property.

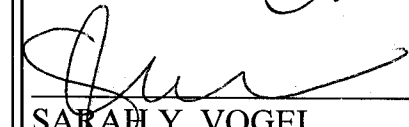
4  
5 A TRUE BILL:

6 DATED:

7  
8 *Signature Redacted per Judicial Policy*

9  
10 FOREPERSON

11   
12 ANNETTE L. HAYES  
13 United States Attorney

14   
15 SARAH Y. VOGEL  
16 Assistant United States Attorney

17   
18 STEVEN T. MASADA  
19 Assistant United States Attorney

20   
21 S. KATE VAUGHAN  
22 Assistant United States Attorney